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VIA OVERNIGHT[®] FEDERAL EXPRESS AND SECURE EMAIL

California Department of Insurance
Field Claims Bureau
300 S. Spring St.
Los Angeles, CA 90013
Attention: Towanda David, Bureau Chief, Field Claims Bureau

**Re: Field Claims Examination Report, Period of March 1, 2011 to February 29, 2012
U. S. Financial Life Insurance Company (NAIC# 84530)**

Dear Ms. David:

On behalf of U. S. Financial Life Insurance Company (the “Company”), I acknowledge receipt of the above referenced Examination Report, adopted November 4, 2013 (the “Report”). The Company appreciates the opportunity to respond to the adopted Report.

The Department identified one instance where a status letter was delayed, a violation of CCR §2695.7(c)(1). The letter was delayed by one day due to a clerical error where the follow-up date was incorrectly set. The Company stated this is an isolated incident and has addressed the issue with pertinent staff for compliance reinforcement.

The Department alleges that this violation is an unfair claims settlement practice. §790.03(h) states:

790.03. The following are hereby defined as unfair methods of competition and unfair and deceptive acts or practices in the business of insurance.

(h) Knowingly committing or performing with such frequency as to indicate a general business practice any of the following unfair claims settlement practices:

The Company does not disagree with the citation for a violation of CCR §2695.7(c)(1). The Company does not believe that this isolated incident of sending a statutory 30-day status letter with a delay of one day meets the standard of an unfair claims settlement practice as the Company has not knowingly committed or performed the practice with such frequency as to indicate a general business practice, CIC 790.03(h).

The Company appreciates the opportunity to respond to the Report.

Very truly yours:

Jens Nachtigal
Assistant Vice President
U. S. Financial Life Insurance Company